

DEL NORTE COUNTY HEALTH AND HUMAN SERVICES

DEFICIENCY PROGRESS REPORT – UPDATE 4

July 11, 2007

Evaluation Date: June 23, 2005

State Evaluation Team

Cal/EPA: Tina Gonzales
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1. **Deficiency:** The CUPA's Application/Operational Manual contains a Consolidated Permit Plan[;] however, it still does not specifically address a system for expedited review, or tracking.

CUPA Corrective Action: This deficiency has been corrected.

2. **Deficiency:** The CUPA has not fully developed and implemented a Unified Inspection and Enforcement Plan. The CUPA's application/operations manual contains some of the required elements, but does not address all the required inspection and enforcement components.

CUPA Corrective Action: This deficiency has been corrected.

3. **Deficiency:** The CUPA staff is lacking on-going training classes attended; files reviewed showed no training attended since the 2000/2001 fiscal year.

CUPA Corrective Action: This deficiency has been corrected.

4. **Deficiency:** [The] CUPA does not require submittal of monitoring plan, plot plan and response plan for review and approval, pursuant to CCR, Title 23, Sections 2634(d) and 2641(g).

CUPA Corrective Action: This deficiency has been corrected.

5. **Deficiency:** [The] CUPA is not inspecting the UST facilities annually.

CUPA Corrective Action: I [Mr. Leon A. Perreault of Del Norte County CUPA] have performed 14 UST inspections, not counting tank removals, during the period of January 1, 2007 through June 30, 2007. The two remaining inspections are scheduled for July 2007.

There are currently 16 UST facilities, of which two are under temporary closure.

Three facilities have had their USTs removed as of this writing—CHP/Crescent City, Crescent City Wastewater Treatment Plant, and Pelican Bay State Prison. Sutter Coast Hospital may also be removing their UST and replacing it with a ConVault sometime during 2007.

- 6. Deficiency:** [The] CUPA is issuing operating permit without determining whether the facility is in compliance.

CUPA Corrective Action: The CHP facility no longer has any USTs, so Cal-EPA's responses concerning this facility are moot.

We will require UST facilities to submit the most current application forms upon permit renewal or update. Since we are in the process of updating our UST permits due to the CUPA name change, this should be corrected within the Fiscal Year 2007-08. I [Mr. Leon A. Perreault of Del Norte County CUPA] agree to incorporate language into our operations manual stating that the most current version of application forms shall be used.

- 7. Deficiency:** The CUPA is not meeting its inspection frequency for CalARP facilities.

CUPA Corrective Action: A recent visit to one of our Cal-ARP locations revealed a partial dismantling of its facility. It was reported to us that the quantity of anhydrous ammonia onsite was less than 500 lbs. We are eliminating this location from our Cal-ARP requirements based on current information.

- 8. Deficiency:** The CUPA does not have a CalARP dispute resolution process that addresses the requirements of [CCR] Title 19, Section 2780.1.

CUPA Corrective Action: This deficiency has been corrected.

- 9. Deficiency:** The CUPA does not appear to be obtaining annual inventories or inventory certification from all regulated businesses.

CUPA Corrective Action: This deficiency has been withdrawn.

- 10. Deficiency:** The CUPA has not reviewed and updated its Area Plan in the last three years. This process had begun when the CUPA lost staff several years ago, and the review languished for lack of staff resources.

CUPA Corrective Action: This deficiency has been corrected.